

EXHIBIT M

From: [Roeser, Stephanie](#)
To: [Theresa Troupson](#); [Stacey Ashby](#); [Local MS. Counsel](#); [Amit Shertzer](#); [Summer Benson](#); [Vaneta Birtha](#); [Miles Cooley](#); [Cortni Davis](#); [Local KAF. Counsel](#); [Jose Perez](#); [Jason Sunshine](#); [mitra@ahouraianlaw.com](#); [Joel Glover](#); [Babcock, Chip](#); [Bryan Freedman](#); [Joel Glover](#)
Cc: [Gottlieb, Michael](#); [Hudson, Esra](#); [Bruno, Matthew](#); [Nathan, Aaron E.](#); [Connolly, Michaela](#); [Taustine, Melissa](#); [Meryl Governski](#); [Bender, Kristin](#); [Moses, Sarah](#); [Nicholas Inns](#); [Kristin Tahler](#); [Danielle Lazarus](#); [Maaren Shah](#); [Climaco, Katelyn](#)
Subject: RE: Lively v. Wayfarer / Liner Freedman v. Lively [IMAN-MATTERS.FID37300]
Date: Wednesday, August 13, 2025 2:56:12 PM
Attachments: [image001.png](#)

Theresa,

As set forth below and in Ms. Lively's omnibus motion to compel, documents from the Liner and MSF firms are responsive to requests already propounded and that the Wayfarer Parties' continued refusal to fully respond to those requests (and to continue to delay inevitable production) is improper.

Notwithstanding that the Court has already implicitly overruled the Wayfarer Parties' unilateral interpretation of the requests to exclude counsel's communications, we understand your response to confirm that the Wayfarer Parties will not be complying with the identified requests by producing their attorneys' responsive communications (which the Court has already explicitly found within their possession custody or control).

Thanks,
Stephanie

Stephanie Roeser
Partner

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From: Theresa Troupson <ttroupson@lftcllp.com>
Sent: Tuesday, August 12, 2025 5:05 PM
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Counsel,

The Court granted Lively “leave to propound renewed interrogatories or document requests to the Wayfarer Parties for the documents or communications sought by Requests 5 and 6.” Do you not intend to do that?

Regards,

Theresa M Troupson
Partner
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From: Roeser, Stephanie <SRoeser@manatt.com>

Sent: Monday, August 11, 2025 3:34 PM

To: Stacey Ashby <sma@msf-law.com>; Local MS. Counsel <ms@msf-law.com>; Amit Shertzer <as@msf-law.com>; Summer Benson <sbenson@lftcllp.com>; Vaneta BIRTHA <vbirtha@lftcllp.com>; Miles Cooley <mcooley@lftcllp.com>; Cortni Davis <cdavis@lftcllp.com>; Local KAF. Counsel <kaf@msf-law.com>; Jose Perez <jperez@lftcllp.com>; Jason Sunshine <jsunshine@lftcllp.com>; mitra@ahouraianlaw.com; Theresa Troupson <ttroupson@lftcllp.com>; Joel Glover <jglover@jw.com>; Babcock, Chip <cbabcock@jw.com>; Bryan Freedman <bfreedman@lftcllp.com>; Joel Glover <jglover@jw.com>

Cc: Gottlieb, Michael <MGottlieb@willkie.com>; Hudson, Esra <EHudson@manatt.com>; Roeser, Stephanie <SRoeser@manatt.com>; Bruno, Matthew <MBruno@manatt.com>; Nathan, Aaron E. <ANathan@willkie.com>; Connolly, Michaela <MConnolly@willkie.com>; Taustine, Melissa <MTaustine@willkie.com>; Meryl Governski <mgovernski@dirllp.com>; Bender, Kristin <kbender@willkie.com>; Moses, Sarah <SMoses@manatt.com>; Nicholas Inns <nicholasinns@quinnemanuel.com>; Kristin Tahler <kristintahler@quinnemanuel.com>; Danielle Lazarus <daniellelazarus@quinnemanuel.com>; Maaren Shah <maarensah@quinnemanuel.com>; Climaco, Katelyn <KClimaco@manatt.com>

Subject: Lively v. Wayfarer / Liner Freedman v. Lively

Counsel,

We write following the Court’s August 4, 2025 Order regarding Liner Freedman Taitelman & Cooley LLP’s Motion to Quash Subpoena (the “Order”), which is attached for your convenience.

Please confirm by the end of day tomorrow that, pursuant to the Order and to Ms. Garofalo’s representations at the hearing, the Wayfarer Parties will agree to supplement their responses to the following discovery requests to include, among other things, any responsive communications between their counsel (including, both Liner Freedman Taitelman & Cooley LLP and Meister Seelig & Fein LLP) and any Content Creator or the press. We request production of such amended responses and documents by Friday, August 15, given the deposition schedule.

- Requests for production

- Nos. 4-9, 19, 44, 50, 52-54 (Baldoni, Wayfarer, IEWU, Heath, Sarowitz)
- Nos. 4-9, 12, 32, 39, 40-42, 100-108, 117, 119 (Abel, Nathan)
- Nos. 4-9, 12, 32, 39, 40-42, 80, 82, 100-108 (TAG)
- Interrogatories
 - Nos. 1-4 (Baldoni, Heath, Sarowitz)
 - Nos. 1, 2, 5, 6 (Wayfarer)
 - Nos. 1, 4, 5 (IEWU)
 - Nos. 2-7 (Abel, Nathan, TAG)

If we do not hear from you on this by end of day tomorrow, August 11, 2025, we will raise the Wayfarer Parties' failure to produce this information, which the court has determined is within their possession, custody or control, in Ms. Lively's reply brief in support of the Omnibus Motion to Compel.

Thanks,

Stephanie Roeser

Partner

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